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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING SOIL SAMPLING WORK PLAN FOR SOLID WASTE
MANAGEMENT UNITS 2, 3, 4, 5 AND 22 NS MAYPORT FL
5/16/2010
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 18, 2010

Mr. Brian Syme, IPT-South Central, OPC6
Department of the Navy
Naval Facilities Engineering Command Southeast
Naval Air Station Jacksonville
135 Ajax Street, Building 903
Post Office Box 30
Jacksonville, Florida 32212-0030

RE: Soil Sampling Report, SWMUs 2 (Landfill B), 3 (Landfill D), 4 (Landfill E), 5 (Landfill F), and 22 (Abrasive Blasting Area), Naval Station Mayport, USEPA ID #FL9 170 024 260, Mayport, Florida (Tetra Tech NUS, May 11, 2010)

Dear Mr. Syme:

I have reviewed the above document dated October 20, 2009 which was received on October 21, 2009, and was prepared under Contract Task Order 0010. This current document looks to be very similar to a previously titled Soil Sampling Report document for these solid waste management units (SWMUs) (dated October 20, 2009) and so I have the same comments as my previous response to document letter. The objectives of the sampling program were detailed in the soil sampling work plan and initially were intended to delineate surface and subsurface soil contamination within and around the SWMUs in excess of the revised FDEP Soil Cleanup Target Levels (SCTLs). Additionally, the sampling results were to support land use control (LUC) boundary definitions at the respective SWMUs. However, during the process, Partnering Team discussions and consensus changed the requirements for soil at these SWMUs, and the sampling program was discontinued. Due to the Partnering Team consensus, the purpose of this document is to report the data obtained during the sampling events. During the November 2008 Partnering Team meeting, discussion concluded that since SWMUs 2, 3, 4, and 5 were originally classified as landfills, at a minimum, LUCs will be required and the sites included in annual inspections. LUCs would be initiated to prevent residential and/or residential-like uses and implement digging prohibitions. This Soil Sampling Report (SSR) states that it will be followed by a Statement of Basis for each of these SWMUs. According to the SSR, SWMU 22 would receive a "no further action" letter since it no longer contains contaminants of concern above SCTLs. This document also states that "Groundwater investigation results at SWMUs 2, 3, 4, 5, and 22 are addressed in the draft CMS Report. Regulatory oversight responsibility of the sediments located in the ditches at these SWMUs has been transferred from the Resource Conservation and Recovery Act Program to the FDEP Storm Water Program per an agreement reached at the Partnering Team meeting in January 2007." Groundwater and sediments were not considered for further investigation in this effort. After reviewing the document, I feel it is adequate for its intent and purpose of reporting the soil sampling data obtained during the soil sampling events. Based on the reevaluation of contaminants of potential concern, I concur with the Navy's and Tetra Techs' identification of COCs for soil (surface and subsurface) at each

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SWMU. However, it is still unclear to me as to why groundwater sampling had been previously considered sufficient by the Partnering Team, and that SWMU 22 should receive a Site Rehabilitation Completion Order from the State. Please provide documented evidence to this office that shows groundwater contaminants are below their respective groundwater cleanup target levels (GCTLs).

Thank you for the opportunity to review this document. If you require additional clarification or other assistance, please feel free to contact me at 850/245-8999.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Winters".

John Winters, P.G.
Remedial Project Manager

JJC  ESN 

cc Tim Bahr, FDEP, Tallahassee